

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Civil Action No. 02-2917 (JEI)

**NOTICE OF MOTION OF DEFENDANT FOR JUDGMENT AS A MATTER OF LAW  
PURSUANT TO FED. R. CIV. P. 50(b)**

Allen Press, Esquire  
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Suite 700  
St. Louis, MO 63105

**PLEASE TAKE NOTICE** that on Tuesday, September 6, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant, the Air Line Pilots

Association International, shall move before the United States District Court for the District of New Jersey, at the U. S. Courthouse and Post Office Building in Camden, New Jersey, for an Order granting judgment in favor of ALPA, and dismissing this action with prejudice, on the grounds that, notwithstanding the jury's liability verdict in this case, ALPA is entitled to judgment as a matter of law.

In support of this motion, the undersigned shall rely upon the brief being submitted with this Notice of Motion, the accompanying Declaration of Counsel and the record herein. A proposed form of Order is also being submitted.

Oral argument is requested.

Respectfully submitted,

ARCHER & GREINER  
A Professional Corporation

By: /s/ Steven J. Fram  
STEVEN J. FRAM, ESQUIRE

*Pro Hac Vice:*

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Counsel for Defendant, Air Line Pilots Association

Dated: August 10, 2011.  
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